## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,	§ §	Case No. 3:20-cv-00451
Plaintiffs,	§ §	
v.	§ § §	
Broadcom Inc., Brocade Communications Systems LLC, and Extreme Networks, Inc.,	& & &	Jury Demand
Defendants.	§ §	

## PLAINTIFFS SNMP RESEARCH, INC.'S AND SNMP RESEARCH INTERNATIONAL, INC.'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Comes now the Plaintiffs, SNMP Research, Inc. and SNMP Research International, Inc. (collectively "Plaintiffs"), by and through counsel, and pursuant to Fed. R. Civ. P. 5.2, Local Rule 26.2(b) of this Court and this Court's Memorandum and Order Regarding Sealing Confidential Information (Dkt. 11), move for leave to file the items listed below under seal in conjunction with the filing of Plaintiffs' Opposition to Extreme Networks, Inc.'s ("Extreme") Supplemental Brief Regarding Privilege Assertions ("Brief"),

Plaintiffs seek leave of court to file the following Exhibits to the Declaration of Olivia Weber ("Weber Declaration") under seal:

1. Exhibits B, C, D, E, F, H, I, J, O, Q, R, S, T, U, V, W, X, Z, AA, BB, and DD to the Weber Declaration are all documents marked with a confidentiality designation by Extreme. Pursuant to the protective order in this case (Dkt. 335, p. 48) Plaintiffs are required to file documents with a confidentiality designation under seal. Plaintiffs take no position on whether

such documents are properly marked with a confidentiality designation and should remain under seal.

- 2. Exhibits K, L, M, and Y to the Weber Declaration are communications between counsel that potentially contain information that Extreme would request be filed under seal as they may contain discussions about Extreme confidential information. Out of an abundance of caution Plaintiffs have filed these documents under seal, but take no position on whether such documents are properly marked with a confidentiality designation and should remain under seal.
- 3. Exhibit P to the Weber Declaration is a letter written by Extreme's counsel that contains a section marked confidential by Extreme's counsel. Plaintiffs take no position on whether a portion of Exhibit P is properly marked with a confidentiality designation and should remain under seal.
- 4. Also, Plaintiffs seek leave to file an unredacted version of their Brief under seal, because the Brief contains quotes from the documents listed above. Plaintiffs take no position on whether the Brief should remain under seal.

## Respectfully submitted this 1<sup>st</sup> day of December, 2023.

/s/ John L. Wood

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